



413 North Calhoun Street  
West Liberty, IA 52776  
319-627-2145

CONFIDENTIAL – NOT FOR PUBLIC INSPECTION

June 12, 2017

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 Twelfth Street S.W.  
Room 5-A225  
Washington, D.C. 20554

**RE: FCC FORM 481 – CARRIER ANNUAL REPORTING DATA COLLECTION  
CONFIDENTIAL FINANCIAL INFORMATION - SUBJECT TO PROTECTIVE  
ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION (FILED IN  
DOCKETS 14-58) AND CONFIDENTIAL FINANCIAL INFORMATION FILED  
PURSUANT TO SECTIONS .457 AND .459 OF THE FEDERAL COMMUNICATIONS  
COMMISSION RULES**

Dear Ms. Dortch,

West Liberty Telephone Company hereby submits the attached confidential version of its "FCC Form 481 – Carrier Annual Reporting Data Collection" financial information pursuant to sections §54.313 and §54.422 of the Commission's rules, as filed with the Universal Service Administrative Company.

Section 3005 of Form 481 requires the filing of financial information per 47 C.F.R. §54.313(f)(2). West Liberty Telephone Company maintains that this information is "Confidential Financial Information" on the grounds that it is competitively sensitive information which could be used to disadvantage or harm West Liberty Telephone Company, and is submitting this information pursuant to Protective Order, DA 12-1857 as described below.



First, West Liberty Telephone Company is submitting the 54.313(f)(2) "Confidential Financial Information" as a "Stamped Confidential Document" with each page bearing the legend CONFIDENTIAL FINANCIAL INFORMATION - SUBJECT TO PROTECTIVE ORDERBEFORE THE FEDERAL COMMUNICATIONS COMMISSION and also submitting the .457 and .459 "Confidential Financial Information" as a "Stamped Confidential Document" with each page labeled "CONFIDENTIAL FINANCIAL INFORMATION - SUBJECT TO PROTECTIVE ORDERBEFORE THE FEDERAL COMMUNICATIONS COMMISSION. One copy of the "Stamped Confidential Document(s)" and accompanying cover letter are enclosed.

Second, West Liberty Telephone Company is filing one copy of the "Redacted Confidential Document(s)" and accompanying cover letter with each page labeled "REDACTED - FOR PUBLIC INSPECTION" through the Commission's Electronic Comment Filing System ("ECFS").

FCC Form 481 will also be filed prior to July 1st with the State Commission.

Please contact me with any questions you have on this filing.

Sincerely,

/s/ Lane Bailey

Lane Bailey  
West Liberty Telephone Company  
(319) 627-2145

Attachments

FCC Form 481 - Carrier Annual Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0399/OMB Control No. 3060-0819  
July 2013

Page 1

<010>	Study Area Code	751332
<015>	Study Area Name	WEST LIBERTY TEL CO
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	LANE BAILEY
<035>	Contact Telephone Number: Number of the person identified in data line <030>	3196272145 ext.233
<039>	Contact Email Address: Email of the person identified in data line <030>	baileys@corp.lcom.net
Form Type		54,313 and 54,422

<010>	Study Area Code	351332
<015>	Study Area Name	WEST LIBERTY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	LANE BAILEY
<035>	Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext. 233
<038>	Contact Email Address - Email Address of person identified in data line <030>	bailey@corp.com.net

**<210> For the prior calendar year, were there any reportable voice service outages?**

No

[illegible]

(300) Unfulfilled Service Request  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	351132
<015>	Study Area Name	WEST LIBERTY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	LANE BAILEY
<035>	Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext.233
<038>	Contact Email Address - Email Address of person identified in data line <030>	bailey@corp.lcco.net

<300> Unfulfilled service request (voice)

NA

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

NA

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/CMB Control No. 3060-0819  
July 2013

<010> Study Area Code 351332

<015> Study Area Name WEST LIBERTY TEL CO

<020> Program Year 2018

<030> Contact Name - Person USAC should contact regarding this data LANE BAILEY

<035> Contact Telephone Number - Number of person identified in data line  
<030> 3196272145 ext. 233

<039> Contact Email Address - Email Address of person identified in data line  
<030> bailey@Corp.LCCS.net

<400> Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice

<410> Complaints per 1000 customers for fixed voice 0.0

<420> Complaints per 1000 customers for mobile voice

<430> Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband

<440> Complaints per 1000 customers for fixed broadband 0.0

<450> Complaints per 1000 customers for mobile broadband

(500) Compliance With Service Quality Standards and Consumer Protection Rules  
Data Collection Form

FOC Form 481  
OMB Control No. 3060-0986/CMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	351332
<015>	Study Area Name	WEST LIBERTY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	LANE BAILEY
<035>	Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext. 233
<039>	Contact Email Address - Email Address of person identified in data line <030>	bailey@corp.lcom.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
		3513321a510.pdf
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0985/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	351332
<015> Study Area Name	WEST LIBERTY TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	LANE BAILEY
<035> Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext. 233
<039> Contact Email Address - Email Address of person identified in data line <030>	bailey@Corp.Lcon.net
<600> Certify compliance regarding ability to function in emergency situations	Yes
<610> Descriptive document for Functionality in Emergency Situations	351332ia610.pdf



[illegible]

<010>	Study Area Code	351332
<015>	Study Area Name	WEST LIBERTY TEL CO
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	LANE BAILEY
<035>	Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext. 233
<039>	Contact Email Address - Email Address of person identified in data line <030>	baileye@corp.lcoo.net

[illegible]

<010>	Study Area Code	351222
<015>	Study Area Name	WEST LIBERTY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	LANE BAILEY
<035>	Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext. 233
<039>	Contact Email Address - Email Address of person identified in data line <030>	bailey@corp.lcom.net

-810>	Reporting Carrier	WEST LIBERTY TELEPHONE COMPANY
-811>	Holding Company	West Liberty Telephone Company
-812>	Operating Company	WEST LIBERTY TELEPHONE COMPANY

[illegible]

(900) Tribal Lands Reporting Data Collection Form:	FCC Form 481 CMB Control No. 3060-0886 / CMB Control No. 3060-0819 July 2013
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<010> Study Area Code	351332
<015> Study Area Name	WRST LIBERTY TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	LANE BAILEY
<035> Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext. 233
<038> Contact Email Address - Email Address of person identified in data line <030>	bailey@corp.lcom.net

<000> Does the filing entity offer tribal land services? (Y/N) NO

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning.
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements

Select Yes or No or Not Applicable

(1000) Voice and Broadband Service Rate Comparability  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	351332
<015>	Study Area Name	WEST LIBERTY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	LANE BAILEY
<035>	Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext. 233
<039>	Contact Email Address - Email Address of person identified in data line <030>	bailey@Corp.Lcon.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance 351332ia1010.pdf

\_\_\_\_\_  
Name of Attached Document

<1020> Broadband comparability certification Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance 351332ia1030.pdf

\_\_\_\_\_  
Name of Attached Document

(1100) No Terrestrial Backhaul Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	251332
<015>	Study Area Name	WEST LIBERTY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	LANE BAILEY
<035>	Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext. 233
<039>	Contact Email Address - Email Address of person identified in data line <030>	bailey@corp.lcom.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers  
Lifeline  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	351332
<015> Study Area Name	WEST LIBERTY TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	LANE BAILEY
<035> Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext.233
<039> Contact Email Address - Email Address of person identified in data line <030>	bailey@Corp.Lcom.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

3513321a1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP [www.libertycommunications.com](http://www.libertycommunications.com)

\*Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers. ☒

<1222> Details on the number of minutes provided as part of the plan. ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

CMB Control No. 3080-0988/CMB Control No. 3080-0819

July 2013

<010>	Study Area Code	351132
<015>	Study Area Name	WEST LIBERTY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	LANS BARTLEY
<035>	Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext. 233
<039>	Contact Email Address - Email Address of person identified in data line <030>	bartley@corp.lcom.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase I support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

## Incremental Connect America Phase I reporting

<p>&lt;2011&gt; 3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.</p> <p>&lt;2022&gt; Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/ 1Mbps - 54.313(b)(2)(i). Round 2 recipients only.</p> <p>&lt;2023&gt; The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.</p> <p>&lt;2024A&gt; Round 2 Recipient of Incremental Support?</p> <p>&lt;2024B&gt; Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.</p> <p>&lt;2025A&gt; Round 2 Recipient of Incremental Support?</p> <p>&lt;2025B&gt; Attach geocoded information for Phase I milestone reports (Round 2 for year three) - Connect America Fund, WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).</p> <p>&lt;2015&gt; 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)</p>	<div style="border: 1px solid black; width: 100px; height: 15px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; width: 100px; height: 15px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; width: 100px; height: 15px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; width: 100px; height: 15px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; width: 100px; height: 15px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; width: 100px; height: 15px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; width: 100px; height: 15px; margin-bottom: 10px;"></div>	<p>Name of Attached Document Listing Required Information</p> <div style="border: 1px solid black; width: 180px; height: 40px; margin-bottom: 10px;"></div> <p>Name of Attached Document Listing Required Information</p> <div style="border: 1px solid black; width: 180px; height: 40px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; width: 100px; height: 15px; margin-bottom: 10px;"></div>
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(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0619

July 2013

Price Cap Carrier Connect America IOC Support {47 CFR § 54.313(d)}

&lt;2016&gt; Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

&lt;2017A&gt; Connect America Fund Phase II recipient?

&lt;2017C&gt; Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

&lt;2018&gt; Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing  
Required Information

&lt;2019&gt; Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

<010>	Study Area Code	351332
<015>	Study Area Name	WEST LIBERTY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	LANE BAILEY
<035>	Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext. 233
<039>	Contact Email Address - Email Address of person identified in data line <030>	bailey@Corp.Lcom.net

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)	Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations (47 CFR § 54.313(f)(1)(i))		351332ia3010.pdf, 351332ia3012.pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
	If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		<input type="checkbox"/>
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input checked="" type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input checked="" type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input checked="" type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	351332ia3024.pdf, 351332ia3026Redacted.pdf

(3005) Rate Of Return Carrier Additional Documentation (Continued)	FCC Form 461
Data Collection Form	OMB Control No. 3060-0866/OMB Control No. 3060-0619
	July 2013

<010> Study Area Code	351222
<015> Study Area Name	WEST LIBERTY TEL CO
<020> Program Year	2013
<030> Contact Name - Person USAC should contact regarding this data	LANE BATTLE
<035> Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext. 233
<039> Contact Email Address- Email Address of person identified in data line <030>	h@illeyecorp.com

## Financial Data Summary

(3027) Revenue	5917799
(3028) Operating Expenses	5376001
(3029) Net Income	541798
(3030) Telephone Plant In Service (TPIS)	7602395
(3031) Total Assets	9341313
(3032) Total Debt	0
(3033) Total Equity	8661332
(3034) Dividends	0

Name of Attached Document Listing Required Information

(4005) Rural Broadband Experiment Additional Documentation  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/ OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	351332
<015>	Study Area Name	WEST LIBERTY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	LANE BAILEY
<035>	Contact Telephone Number - Number of person identified in data line <030>	3196272145 EXT. 233
<039>	Contact Email Address - Email Address of person identified in data line <030>	bailey@Corp.Lcom.net

#### 4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

#### Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

#### Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

#### Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0906/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	351332
<015> Study Area Name	WEST LIBERTY TEL CO
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	LANE BAILEY
<035> Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext. 233
<039> Contact Email Address - Email Address of person identified in data line <030>	bailey@Corp.Lcom.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF.

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or U Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients, and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	WEST LIBERTY TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date 06/05/2017
Printed name of Authorized Officer:	Lane Bailey
Title or position of Authorized Officer:	ACCOUNTANT
Telephone number of Authorized Officer:	3196270233 ext.
Study Area Code of Reporting Carrier:	351332 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form		ROC Form 481 CMB Control No. 3060-0886/CMB Control No. 3060-0819 July 2013
<010> Study Area Code	351312	
<015> Study Area Name	WEST LIBERTY TEL CO	
<020> Program Year	2018	
<030> Contact Name - Person USAC should contact regarding this data	LANE BAILEY	
<035> Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext. 213	
<039> Contact Email Address - Email Address of person identified in data line <030>	bailey@corp.lcom.net	

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent Firm: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Name of Authorized Agent Employee: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

<701> Residential Local Service Charge Effective Date	1/1/2017
<702> Single State-wide Residential Local Service Charge	1.0

<703>

[illegible]



<010>	Study Area Code	351132
<015>	Study Area Name	WEST LIBERTY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	LANE BAILEY
<035>	Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext.233
<038>	Contact Email Address - Email Address of person identified in data line <030>	bailey@Corp.Lcca.net

[illegible]

<010>	Study Area Code	351332
<015>	Study Area Name	WEST LIBERTY TEL CO
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	LANE BAILLY
<035>	Contact Telephone Number - Number of person identified in data line <030>	3196272145 ext.233
<039>	Contact Email Address - Email Address of person identified in data line <030>	bailey@Corp.Lcoo.net
<810>	Reporting Carrier	WEST LIBERTY TELEPHONE COMPANY
<811>	Holding Company	West Liberty Telephone Company
<812>	Operating Company	WEST LIBERTY TELEPHONE COMPANY

[illegible]

351332ia510

West Liberty Telephone Company

Service Quality Standards and Consumer Protection Rules Compliance

Telco complies with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and Subpart Y, Truth in Billing Requirements for Common Carriers, and Federal Trade Commission Red Flag rules to prevent identity theft. A company manual for CPNI and Red Flags is in place, and employee training is conducted annually and new hires are instructed on the programs as required by their job functions.

351332ia610

West Liberty Telephone Company

Functionality in Emergency Situations

Our backup power capabilities include significant battery back up capabilities at both Central Offices, along with natural gas generators. Our rural equipment has an eight hour battery backup, which will soon be increased to sixteen hours as a result of the switch to more efficient equipment requiring less power. We also maintain seven gasoline fueled portable generators for maintaining power to rural equipment in extended outages.

Important communications links are protected by redundant fibers and equipment inside of our Central Office. Our rural plant in West Branch is protected by an ERPS ring. Our rural plant in West Liberty is also protected by an ERPS ring.

In an emergency situation we would regulate excessive traffic by rate limiting specific VLAN's to ensure delivery of essential services.

351332ia710

[illegible]

351332ia1010

West Liberty Telephone Company

Voice Service Rate Comparability

Per Public Notice DA 17-167, for reporting year 2016 the average urban local service rate floor was \$22.49. After adding two standard deviations our residential local service rates are under the benchmark total of \$49.51.

Our Company's residential local service rates are as follows;

Residential urban	\$22.95
Residential rural	\$22.95

The only state fee to be added to these rates is a \$1.00 E-911 service charge.

West Liberty Telephone Company hereby certifies that all its residential local service rates are below the average urban local service rate plus two standard deviations as prescribed by the Wireline Competition Bureau.

JS/ Jerry S. Melick      Date 5/22/17  
Signature

Jerry S. Melick

President

351332ia1030

West Liberty Telephone Company

Broadband Service Rate Comparability

West Liberty Telephone Company hereby certifies that it offers a 10M down 1M up broadband connection rate that is priced under the \$77.98 benchmark as prescribed by the Wireline Competition Bureau.

/s/ Jerry S. Melick  
Signature

Date 5/22/17

Jerry S. Melick

President

351332ia1210

West Liberty Telephone Company

Lifeline Customers Minutes of Use and Additional Toll Charges

Lifeline customers receive the same residential service as regular subscribers, but at a reduced monthly recurring rate.

Thus, lifeline subscribers have an unlimited number of local calling minutes.

As for toll, lifeline subscribers, similar to every West Liberty Telephone subscriber, are free to choose their own toll usage plans through IXC's that serve the West Liberty Telephone exchange.



351332ia3010

West Liberty Telephone Company

Milestone Certification

I certify that West Liberty Telephone Company has taken reasonable steps to provide, upon reasonable request, broadband service at actual speeds of at least 10Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to reasonably comparable offerings in urban areas, and that requests for such service are met within a reasonable amount of time.

/s/ Jerry S. Melick  
Signature

5/22/17  
Date

Jerry S. Melick

President

351332ia3012

West Liberty Telephone Company

Community Anchor Institutions

West Liberty Telephone Company did not provide newly deployed broadband service to any Anchor Institutions in the community during the previous calendar year. The reason it did not do so is because all said institutions were all already being served.

351332ia3024

West Liberty Telephone Company

Officer Certification of Financial Statements

I certify that I am an officer of the reporting carrier. My responsibilities include ensuring the accuracy of financial reporting. I hereby certify that West Liberty Telephone Company was not audited in the ordinary course of business in the preceding fiscal year and the attached reviewed financial information is in accordance with the accounts and other records of our system and to the best of my knowledge and belief the information reported is accurate.

/s/ Craig A. Bieber  
Signature

5/22/17  
Date

Craig A. Bieber

Treasurer

351332ia3026

West Liberty Telephone Company

Confidentiality of Financial Information

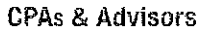
I certify that the attached pages of financial information for West Liberty Telephone Company which are labeled as confidential (Confidential) are such under the protective orders of the following dockets:  
CONFIDENTIAL FINANCIAL INFORMATION – SUBJECT TO  
PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION.

/s/ Jerry S. Melick  
Signature

5/22/17  
Date

Jerry S. Melick

President



To the Board of Directors  
West Liberty Telephone Company and Subsidiary  
Page 2

***Other Matter***

The accompanying supplementary consolidating information is presented only for purposes of additional analysis of the consolidated financial statements rather than to present the financial position, results of operations and cash flows of the individual companies, and is not a required part of the basic consolidated financial statements. Such information is the responsibility of management and was derived from, and relates directly to, the underlying accounting records used to prepare the financial statements. The supplementary information has been subjected to the review procedures applied in our review of the basic consolidated financial statements. We are not aware of any material modifications that should be made to the supplementary consolidating information. We have not audited the supplementary consolidating information and do not express an opinion on such information.

***Report on the 2015 Consolidated Financial Statements***

The 2015 consolidated financial statements of West Liberty Telephone Company were reviewed by other accountants whose report dated May 10, 2016, stated that they were not aware of any material modifications that should be made to those statements in order for them to be in conformity with accounting principles generally accepted in the United States of America.

*BKD, LLP*

West Des Moines, Iowa  
May 11, 2017

**West Liberty Telephone Company**  
**Consolidated Balance Sheets**  
**December 31, 2016 and 2015**

	<u>2016</u>	<u>2015</u>
<b>Assets</b>		
<b>Current Assets</b>		
Cash and cash equivalents	\$ 716,297	\$ 538,907
Accounts receivable:		
Due from customers	334,460	351,269
Interexchange carriers	74,452	112,169
Other	20,812	5,662
Inventory	145,808	179,116
Prepayments	<u>142,663</u>	<u>109,290</u>
	<u>1,434,492</u>	<u>1,296,413</u>
<b>Other Noncurrent Assets</b>		
Partnership investments	30,268	45,132
Other investments	196,943	196,943
Intangibles, net of amortization	<u>77,215</u>	<u>87,542</u>
	<u>304,426</u>	<u>329,617</u>
<b>Property, Plant and Equipment</b>		
Plant in service	24,455,070	23,910,395
Less accumulated depreciation	<u>16,852,675</u>	<u>16,016,284</u>
	<u>7,602,395</u>	<u>7,894,111</u>
<b>Total Assets</b>	<u>\$ 9,341,313</u>	<u>\$ 9,520,141</u>

	<u>2016</u>	<u>2015</u>
<b>Liabilities and Stockholders' Equity</b>		
<b>Current Liabilities</b>		
Accounts payable	\$ 52,450	\$ 89,802
Advance billing and payments	501,955	468,551
Customer deposits	2,971	5,725
Accrued taxes	65,271	72,294
Other	<u>57,334</u>	<u>47,951</u>
	<u>679,981</u>	<u>684,323</u>
<b>Stockholders' Equity</b>		
Common stock - \$1 par value, 2,000,000 shares authorized, 7,692 shares issued and outstanding	7,692	7,692
Retained earnings	<u>8,369,265</u>	<u>8,575,797</u>
	8,376,957	8,583,489
Noncontrolling interest	<u>284,375</u>	<u>252,329</u>
	<u>8,661,332</u>	<u>8,835,818</u>
<b>Total Liabilities and Stockholders' Equity</b>	<u>\$ 9,341,313</u>	<u>\$ 9,520,141</u>



**West Liberty Telephone Company**  
**Consolidated Statements of Operations**  
**Years Ended December 31, 2016 and 2015**

	<u>2016</u>	<u>2015</u>
<b>Operating Revenues</b>		
Local network services	\$ 885,422	\$ 835,583
Network access services	2,284,953	2,409,812
Long distance services	75,020	85,816
Internet services	1,646,144	1,618,116
Video services	731,857	744,463
Equipment sales	173,230	170,336
Miscellaneous revenue	<u>121,173</u>	<u>136,374</u>
	<u>5,917,799</u>	<u>6,000,500</u>
<b>Operating Expenses</b>		
Plant specific operations	960,550	900,591
Plant nonspecific operations	112,368	149,414
Cost of long distance services	99,765	89,120
Cost of internet services	253,891	247,455
Cost of video services	518,471	584,100
Cost of equipment sales	135,112	155,245
Depreciation and amortization	1,719,033	1,781,941
Customer operations	638,300	556,148
Corporate operations	890,970	857,986
General taxes	<u>47,541</u>	<u>48,312</u>
	<u>5,376,001</u>	<u>5,370,312</u>
<b>Operating Income</b>	<u>541,798</u>	<u>630,188</u>
<b>Other Income (Expense)</b>		
Interest and dividend income	77,870	124,102
Interest expense	(164)	(207)
Other, net	<u>2,210</u>	<u>(31,074)</u>
	<u>79,916</u>	<u>92,821</u>
<b>Income Before Noncontrolling Interest in Net Income</b>	621,714	723,009
<b>Noncontrolling Interest in Net Income</b>	<u>(59,046)</u>	<u>3,455</u>
<b>Net Income</b>	<u>\$ 562,668</u>	<u>\$ 726,464</u>

**West Liberty Telephone Company**  
**Consolidated Statements of Cash Flows**  
**Years Ended December 31, 2016 and 2015**

	<u>2016</u>	<u>2015</u>
<b>Operating Activities</b>		
Net income	\$ 562,668	\$ 726,464
Adjustments to reconcile net income to net cash provided by operating activities:		
Depreciation and amortization	1,719,033	1,781,941
Equity loss in unconsolidated affiliates	13,667	28,048
Distributions received from unconsolidated affiliates	1,197	-
Noncontrolling interest	59,046	(3,455)
Loss on disposal of property	-	19,500
Changes in assets and liabilities:		
(Increase) Decrease in:		
Receivables	39,376	37,104
Inventory	40,285	(29,491)
Prepayments	(33,373)	6,222
Increase (Decrease) in:		
Accounts payable	(7,415)	(157,506)
Accrued taxes	(7,023)	(24,454)
Other	40,033	16,342
Net cash provided by operating activities	<u>2,427,494</u>	<u>2,400,715</u>
<b>Investing Activities</b>		
Capital expenditures	(1,455,104)	(1,641,873)
Purchase of intangibles	-	(31,875)
Proceeds from sale of investments	-	23,644
Salvage, net of cost of removing plant	1,200	(61,362)
Net cash used in investing activities	<u>(1,453,904)</u>	<u>(1,711,466)</u>
<b>Financing Activities</b>		
Distributions to noncontrolling interest	(27,000)	-
Capital call	-	75,000
Distributions paid	(769,200)	(769,200)
Net cash used in financing activities	<u>(796,200)</u>	<u>(694,200)</u>
Net Increase (Decrease) in Cash and Cash Equivalents	177,390	(4,951)
Cash and Cash Equivalents at Beginning of Year	<u>538,907</u>	<u>543,858</u>
Cash and Cash Equivalents at End of Year	<u>\$ 716,297</u>	<u>\$ 538,907</u>